

### **REMARKS**

Claims 1-22 are pending in this Application. Claims 1-22 stand rejected. Applicant respectfully requests reconsideration and favorable action.

#### **Claim Objections**

The Office Action reasserts the objections to claims 1, 2, 6-8, 10, 13, 21-22 from the Office Action mailed August 25, 2006. The claims stand objected to for reciting "service/product" several times. The Office Action states it is not clear if it is meant to be "service and product" or if it is meant to be "service or product." In response, each objected to claim is amended to recite "service or product" or, as applicable, the plural form "services or products." The claim amendments are made for clarity and do not affect claim scope. Read in light of the Specification, the term "service/product" clearly meant "service or product."

#### **Rejections under 35 U.S.C. § 102**

Claims 1-2, 4-8, 12-13, 15-17, 19, and 21-22 stand rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,510,411 (hereinafter "*Norton*").

Claim 1 is currently amended to correct a typographical error related to "have ~~more~~ two or more." Claim 1, as discussed above, is also amended to clarify "service/product" as "service or product." These clarifying amendments are not made for reasons related to patentability and do not affect claim scope.

Claim 1 is currently amended to recite, "wherein the services or products are not inclusive of the automated self-service HTU call system." As amended, claim 1 is patentable over *Norton* for at least the reason that *Norton* does not teach or suggest this claim element. *Norton's* how to use (HTU) instructions are concerned with how to use *Norton's* (graphical user interface) GUI. *Norton's* services are inclusive of the automated self-service HTU call system and *Norton's* disclosed system. Therefore *Norton* does not anticipate claim 1 under 35 U.S.C. § 102.

Claim 2 stands rejected for reasons similar to claim 1. Claim 2, similar to claim 1, is currently amended to recite, "wherein the first services or products are not inclusive of the automated self-service HTU call system." Claim 2 is also amended to recite, "providing the caller with a help feature, wherein the help feature is for assisting the caller with using the automated self-service HTU, wherein the automated self-service HTU is a second service or product." As amended, claim 2 is patentable over *Norton* for at least the reason that *Norton's* services are inclusive of the automated self-service HTU call system. Also, *Norton* does not disclose a first service or product and a second service or product, wherein the automated self-service HTU is a second service or product.

Claim 13 stands rejected as anticipated by *Norton*. Claim 13 is currently amended to recite "wherein the services or products are not inclusive of the automated self-service HTU call system." Also Claim 13 is currently amended to recite, "a Get Help module configured to provide the caller with assistance in operating the automated self-service HTU call system." For argument's sake, if *Norton* discloses a Get Help module configured to provide the caller with assistance in operating an automated self-service HTU call system, then it does not disclose Claim 13's "Get Service Name module configured to prompt the caller to name or describe a service/product service or product or to ask for a list of services or products services/products, and for recognizing the caller's response." *Norton's* HTU instructions help a user in using *Norton's* interface. *Norton* does not disclose Claim 13's "Get Service Name module configured to prompt the caller to name or describe a service/product service or product or to ask for a list of services or products services/products, and for recognizing the caller's response, wherein the services or products are not inclusive of the automated self-service HTU call system." Because *Norton* does not teach expressly or inherently all elements of claims 1, 2 and 13 as amended, Applicants respectfully request the Examiner to reconsider and withdraw the anticipation rejections of Claim 1, 2, and 13 and dependent Claims 4-8, 12-13, 15-17, 19, and 21-22.

**Rejections under 35 U.S.C. § 103**

Claims 3, 10, and 20 stand rejected under 35 U.S.C. § 103(a) as unpatentable over *Norton*, and further in view of U.S. Patent Publication No. 2002/0055351 A1, *Elsey* et al. (hereinafter “*Elsey*”). Claim 3 depends from amended claim 2. Claim 2 is currently amended to recite, “wherein the first services or products are not inclusive of the automated self-service HTU call system.” Claim 2, further recites as amended, “providing the caller with a help future, wherein the help feature is for assisting the caller with using the automated self-service HTU, wherein the automated self-service HTU is a second service or product.” As discussed above with regard to claim 2, *Norton* does not disclose these elements. Further, no combination of *Norton* and *Elsey* teaches or suggests these elements. Claim 10 depends from claim 2, and is patentable for at least the reasons discussed above with regard to claim 2. Claim 20 depends from amended claim 13, and is patentable for at least the reasons discussed above with regard to amended claim 13.

Claims 9 and 18 stand rejected under 35 U.S.C. § 103(a) as unpatentable over *Norton*, and further in view of U.S. Patent Publication No. 2001/0014146 A1, *Beyda* et al. (hereinafter, “*Beyda*”). Claim 9 depends from amended claim 2. Claim 2 is currently amended to recite, “wherein the first services or products are not inclusive of the automated self-service HTU call system.” Claim 2, further recites as amended, “providing the caller with a help future, wherein the help feature is for assisting the caller with using the automated self-service HTU, wherein the automated self-service HTU is a second service or product.” As discussed above with regard to claim 2, *Norton* does not disclose these elements. Further, no combination of *Norton* and *Beyda* teaches or suggests these elements.

Claim 18 depends from amended claim 13. As discussed above, *Norton* does not disclose every element of amended claim 13. Further, no combination of *Norton* and *Beyda* discloses every element of amended claim 13. For at least this reason, claim 18 is allowable over the cited references under 35 U.S.C. § 103(a).

Claims 11 and 14 stand rejected under 35 U.S.C. § 103(a) as unpatentable over *Norton*, and further in view of U.S. Patent Publication No. 2001/0025309 A1, *Beck* et al. (hereinafter,

“*Beck* ”). Claim 11 depends from amended Claim 2. Claim 2 is currently amended to recite, “wherein the first services or products are not inclusive of the automated self-service HTU call system.” Claim 2, further recites as amended, “providing the caller with a help future, wherein the help feature is for assisting the caller with using the automated self-service HTU, wherein the automated self-service HTU is a second service or product.” As discussed above with regard to claim 2, *Norton* does not disclose these elements. Further, no combination of *Norton* and *Beck* teaches or suggests these elements.

Claim 14 depends from amended claim 13. As discussed above, *Norton* does not disclose every element of amended claim 13. Further, no combination of *Norton* and *Beck* discloses every element of amended claim 13. For at least this reason, claim 14 is allowable over the cited references under 35 U.S.C. § 103(a).

### CONCLUSION

Applicant believes this response addresses each ground of objection and rejection in the office action. Applicant respectfully requests consideration and favorable action with respect to the pending claims.

No fees are due at this time; however, the Commissioner is hereby authorized to charge any fees necessary, or credit any overpayment, to Deposit Account No. 10-0096 of Jackson Walker L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.236.2025.

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